

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
Plaintiff	)	No. 08 CR 401-26
	)	
v.	)	Judge MARTIN ASHMAN
	)	
	)	
LATASHA WILLIAMS,	)	
Defendant	)	

**MOTION TO EXONERATE BOND AND**  
**REMAND INTO FEDERAL CUSTODY**

Now comes the Defendant, LATASHA WILLIAMS, by and through her attorney, Charles J. Aron, and moves this Honorable Court for an order exonerating the Defendant's Bond and ordering her remanded into Federal custody. In support thereof, it is stated:

1. LATASHA WILLIAMS is the defendant in the above captioned cause.
2. On June 11, 2008, this Honorable Court entered an order admitting the Defendant to bond, said bond to be secured by property owned by her grandmother, Lillie Rent and the Defendant to be home-incarcerated.
3. On that date, following her release from Federal custody, the Defendant was taken into State custody for a warrant which was known to State authorities but not disclosed to the Defendant, her counsel, nor this Honorable Court.

4. On July 21, 2008, the Defendant was released from State custody, this release to be monitored electronically.

5. On July 29, 2008, this release was revoked by the Cook County Sheriff's office.

6. During the short time the Defendant was not in the custody of the State authorities, she was in full compliance with the terms of the bond as set by this Honorable Court.

7. Because of her custodial status, the bond set by this Honorable Court is no longer viable and is an unnecessary burden on the Defendant's grandmother, Lillie Rent.

8. While in the Cook County Department of Corrections, the Defendant cannot properly meet with and consult with her attorney in this matter, which carries a potential life sentence.

9. Her ability to meet with her attorney and her ability to cooperate with Federal authorities is severely compromised by her being in the custody of the State.

10. Had the existence of the State warrant been made known to the attorney for the Defendant or this Honorable Court, the bond which this Honorable Court set would, in all likelihood, never have been granted.

WHEREFORE, it is prayed that the order admitting the Defendant, LATASHA WILLIAMS, be vacated, nunc pro tunc, to July 29, 2008; that the bond posted by the Defendant's Grandmother, Lillie Rent, be exonerated and the property released; that an order be entered remanding the Defendant, LATASHA WILLIAMS, into Federal custody and whatever other relief this Honorable Court deems to be equitable and just.

Respectfully Submitted,

s/  
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